



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF

PUBLIC INFORMATION

WASHINGTON, D.C. 20460

MEMORANDUM

SUBJECT: Request for a Removal Action at the Hillsdale Drum Site, Hillsdale, St. Helena Parish, Louisiana

FROM: Robert M. Ryan, P.E. *Robert M. Ryan, P.E.*  
Senior On-Scene Coordinator  
Response/Investigation Section (6E-EI)

TO: B. J. Wynne  
Regional Administrator (6A)

THRU: Russell F. Rhoades *Russell F. Rhoades*  
Director  
Environmental Services Division (6E)

Site  
ID#: 2X

## I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed Classic Emergency Removal Action described herein, pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Superfund Amendments and Reauthorization Act (SARA), for the Hillsdale Drum Site, Hillsdale, St. Helena Parish, Louisiana. The proposed action involves site stabilization, which includes: restaging drums and materials from three separate locations to one location, sampling and analysis of drums and containers of materials, restricting site access, temporary relocation of a family, and site security. The State of Louisiana has obtained information that all three locations were operated by the same companies and/or individuals. This action meets the criteria for initiating a removal action under Section 300.415(b)(2) of the National Contingency Plan (NCP) and is anticipated to require less than twelve months and \$2 million for completion. No actions have been initiated under the On-Scene Coordinator's \$50,000 authority.

II. SITE CONDITIONS AND BACKGROUND  
CERCLIS ID#: Pending

Category of Removal: Classic Emergency



## A. Site Description

### 1. Removal Site Evaluation

On February 12, 1992 the EPA Region 6 Emergency Response Branch received a request for assistance from the Louisiana Department of Environmental Quality (LDEQ) concerning the improper storage of a number of drums at two locations near Hillsdale, St. Helena Parish, Louisiana. The manner of storage of the drums posed a significant fire and explosion threat. Drums of incompatible materials were stored next to each other, i.e. drums labeled oxidizers were stored next to drums with flammable liquids labels, drums with corrosives labels were stored next to drums with poisons labels, etc. Because of the potential for fire and explosion, the LDEQ had requested that the St. Helena Sheriff evacuate a family living in a house trailer approximately 75 yards from one of the storage locations.

EPA Emergency Response Branch and Criminal Investigation Division, EPA Technical Assistance Team (EPA-TAT), the Louisiana State Police, and LDEQ investigated the sites on February 13, 1992. At the site on J.P. Thomas Road (Site A) there were approximately 200 drums, both metal 55-gallon and 40-gallon fiber overpack drums stored outside a 40-foot van trailer. There were approximately 75 drums inside the van trailer. On the ground near the trailer were two piles of what appeared to be vermiculite packing material from the fiber laboratory overpack drums. There was also a pile of ash where it appeared that a number of drums had been burned (evidenced by the metal drum rings). The burn pile also had a number of partially-burned test tube and centrifuge vials in the ashes at the foot of the pile. Near the burn pile was a pile of numerous small containers which had hazardous materials labels, i.e. poison, flammable liquid, restricted-use pesticide, experimental pesticide, corrosive.

The investigation team also investigated a site on LA 441, (Site B) which was located in an abandoned tavern/nightclub. This location had approximately 500 drums and containers stored inside and another 15 drums stored outside behind the building. The drums inside had numerous hazardous materials labels and preliminary information obtained from LDEQ indicated that several of the drums contained corrosive materials (pH <1). The drums in the building were stored in a haphazard fashion and with apparent disregard for compatibility class. There is also a 40-foot van trailer onsite (B) with an unknown number of drums stored inside. Behind the building there is a fenced oxidation pond (for the facility septic system) containing a number of broken laboratory reagent bottles and indications of materials having been dumped and burned. When the investigation team arrived on-site at Site B, the Louisiana State Police had impounded a truck operated by the owner/operator of Site B with a number of drums labeled

polychlorinated biphenyls (PCBs) inside. These drums had been initially stored at Site B and had been sent to a disposal facility which had returned the drums because the disposal facility was not permitted to dispose of PCBs.

On February 17, 1992, the Louisiana State Police informed the OSC of a third site (Site C) in a warehouse in Amite, Tangipahoa Parish, Louisiana. This site had 31 drums of the same type and markings as at the other two sites, a pile of vermiculite packing material, and several plastic bags with "asbestos containing material" labels. Two 40-gallon fiber labpack drums, one with "Poison B Liquid, N.O.S." and the other with "Corrosive Liquid, N.O.S." were discovered leaking. Key problem areas are the improper storage of numerous drums of hazardous materials, with incompatible materials being stored in close proximity; leaking drums of hazardous materials; fire and explosion threat; and potential improper disposal of hazardous materials. The site has not had any other site assessments or investigations performed under Superfund authority.

## 2. Physical Location

The Hillsdale Drum Site is composed of three separate subsites, allegedly all operated and/or managed by the same companies and/or individuals. These subsites have been labeled as Site A (J.P. Thomas Road site), Site B (La Hwy 441 site), and Site C (Amite warehouse site).

The LA Hwy 441 Site (Site B) is located at Rural Route 1, Box 87, Amite, Louisiana, 70422. The site is on Louisiana State Road 441, approximately 3/4 mile south of the town of Hillsdale (population approximately 150). There are two residences approximately 1/4 to 1/2 mile north of the site along SH 441. Land use surrounding the site is primarily rural, with cattle raised for dairy and beef production.

Site A (J.P. Thomas Road site) is located on J.P. Thomas Road, approximately 1/2 mile east of La SH 1045, approximately 1 1/2 miles south of Hillsdale. The site is approximately 100 yards off the road and 75 yards north of a house trailer residence. There is a second residence approximately 250 yards to the southwest and separated from the site by a heavy grove of trees. There is no actual street address for this site. There is a small lake/cattle tank/pond located approximately 100 yards northwest of the site. This water body is used for fishing by local residents and eventually drains to the Tickfaw River.

Site C (Amite warehouse site) is located on Laurel Avenue in the City of Amite. The warehouse is located in the southwestern portion of the city. There are 10 residences within 1/4 mile of the warehouse. Surrounding the warehouse are other warehouses and a railroad track.

### 3. Site Characteristics

The Hillsdale Drum site allegedly results from the activities of four companies, Southern Environmental Services, PSC Environmental Services, Tecrep, Inc., and LabTech, Inc. These companies were licensed transporters of hazardous materials. From information gathered in the investigation, the companies allegedly collected hazardous wastes from different contractors for transport of the materials for disposal. Materials which could not be disposed of were allegedly stored in the van trailers or in the lounge/warehouse. There is a grand total of approximately 300 containers with materials in them, and an additional estimated 600 empty containers.

### 4. Release or Threatened Release Into the Environment of a Hazardous Substance, of Pollutant, or Contaminant

The substances known on-site are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), and further defined at 40 CFR § 302.4. Known substances in the Site B lounge/warehouse building are acetone (flammable liquid), fuming sulfuric acid (corrosive), metallic sodium (flammable solid), sodium hydroxide (caustic) and lab packs containing metaphosphoric acid, nitric acid, hydrochloric acid, drums marked as containing PCBs, and a two labpacks marked as containing biological hazards (medical wastes).

At Site A (J.P. Thomas Road site), the pile of containers next to the burn pile contained several containers of restricted use pesticides and experimental pesticides with warning labels indicating that the pesticides were cholinesterase inhibitors. Additionally, at Site A were containers marked with poison and flammable liquid D.O.T. markings.

In the warehouse at Site C were two leaking fiber drums, one labeled Poison B Liquid and another labeled Corrosive Liquid. Additionally, there were several empty "glove bags" marked with "asbestos containing material" labels, and a pile of an unknown white powdery material and vermiculite mixed together. Additionally, there was one drum marked as containing waste formaldehyde. Allegedly individuals in the company would bring certain of the drums to the site, unpack the labpack drums, combine materials from the labpacks together and take the combined materials for disposal. Once the containers had been emptied, allegedly the hazardous waste labels would be painted over to obscure the labels. Investigations have also discovered that some of the materials from the labpacks were allegedly emptied onto the burn pile and ignited. Once the glass containers of flammable and/or hazardous materials were emptied,

allegedly the glass containers would be broken and dumped into other empty drums. Allegedly these drums would be relabeled with nonhazardous waste labels.

The major potential for future release from all three sites is through fire/explosion. Presently, the drums from all three sites are being restaged, according to compatibility class, at Site B within the lounge/warehouse. Those drums which appear to be in poor condition or in danger of leaking are being overpacked into either metal or poly overpack drums according to the type of material being overpacked. If there were to be a fire/explosion, the fumes and smoke created by the fire would likely be toxic and tend to drift with the prevailing winds over the town of Hillsdale. Contingency plans have been made with both the St. Helena Sheriff's Department and the Hillsdale Volunteer Fire Department for evacuation and fire fighting operations in the event of a fire/explosion.

#### 5. NPL Status

The Hillsdale Drum Site is not on nor proposed for the National Priorities List, and has not received a Hazard Ranking System Score.

#### B. Other Actions to Date

##### 1. Previous Actions

As stated above, the EPA Emergency Response Branch received notification of the site(s) and a request for assistance from the Louisiana Department of Environmental Quality on February 12, 1992, and initiated an investigation and site assessment on February 13, 1992.

On February 13, 1992, representatives of the Emergency Response Branch and the Director of the Environmental Services Division met with the Regional Administrator and received verbal approval of a Classic Emergency Removal Action ceiling of \$100,000. Additionally, temporary relocation of one family who lived near Site A (J.P. Thomas Road site) was accomplished.

On February 14, 1992, the ERCS contractor was mobilized on-site to begin removal activities at Site A (the J.P. Thomas Road site) and at Site B (La Hwy 441 site). The activities were limited to repacking and restaging drums to Site B (La Hwy 441 site), and providing 24-hour security to both sites.

On February 17, 1992, the ERCS contractor was mobilized to provide site security and overpack/restage the drums and materials discovered at Site C (Amite warehouse) to Site B (La Hwy 441 site).



Based upon the judgment of the OSC, the most prudent initial action was to restage all drums and materials from the three subsites to the lounge/warehouse at Site B. Factors considered include: large inside storage capacity available at Site B; relative remoteness of site to surrounding population; fiber drums (labpacks) containing incompatible materials; water reactive materials; adverse weather conditions; and site security.

At Site C (Amite warehouse site) the drums were removed and the floor swept to remove contaminants. No other contaminants are apparent at this site.

Following removal of the trailer, drums and containers, ash pile and vermiculite piles from Site A to Site B, soil samples were collected from Site A and sent for analysis. Approximately three inches of soil from under the ash pile at Site A was removed in an attempt to eliminate surface soil contamination. A fence was constructed around the former ash pile location to prevent unauthorized access and potential direct contact exposure to contaminants which may remain in the soil. Dependent upon analytical results of the soil sampling, future surface and subsurface sampling and removal of contaminated soil may be required.

## 2. Current Actions

Currently, drums in the lounge/warehouse at Site B (La Hwy 441 site) are being restaged according to compatibility class. Each drum is being individually sampled and a hazard categorization (HazCat) test is being performed on each sample. A select number of samples are being drawn for full priority pollutant analysis at a contracted laboratory (Quality Assurance (QA) 2 with Contract Laboratory Program (CLP) data package for data evaluation). The trailer which was restaged from Site A (J.P. Thomas Road site) to Site B (La Hwy 441 site) is being unloaded and the drums staged in the lounge/warehouse. Current actions are being restricted to site/drum stabilization, proper staging and sampling.

## C. State and Local Authorities's Roles

### 1. State and Local Actions to Date

The Louisiana Department of Environmental Quality was notified of the site by an anonymous caller on February 5, 1992. LDEQ and the State Police started investigations of the J.P. Thomas Road site and the La Hwy 441 site on February 6, 1992. Initial investigations of the site indicated the presence of incompatible materials stored next to each other presenting a fire and

explosion hazard. LDEQ requested EPA assistance on February 12, 1992. At the same time, LDEQ requested that the Governor of Louisiana issue a notice of imminent endangerment.

Once the Governor of Louisiana issued the notice, the LDEQ instructed the St. Helena Sheriff's Office to evacuate the family living near the J.P. Thomas Road site. The LDEQ is continuing investigations of the activities at the three locations under state RCRA authority.

The Louisiana State Police obtained search warrants and issued several arrest warrants in conjunction with their criminal investigation of the case. Entry into the two initial sites was made under the State Police Search Warrant authority, and entry into the Amite warehouse site was made under a "Consent to Search" agreement.

Due to the multi-state nature of the potential criminal investigations, the Louisiana State Police requested assistance from EPA Criminal Investigation Division.

### 3. Potential for Continued State/Local Response

The LDEQ and State Police will be continuing their respective investigations. EPA has assumed the lead in the removal action; however, data collected from both HazCat analysis and full priority pollutant scan analysis will be shared by all parties involved. LDEQ and State Police representatives are remaining on-site during all investigative activities. The St. Helena Sheriff's Office is providing 24-hour site security and assisted EPA and ERCS in obtaining rapid electrical and water connections.

## III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

### A. Threats to Public Health or Welfare

At the Hillsdale Drum site there is a total of approximately 900 drums. Of these there are approximately 200 drums and 80 5-gallon containers inside the warehouse. There are also approximately 50 drums inside the trailer from the J.P. Thomas Road site which still need to be removed from the trailer and staged inside the warehouse. There are also 9 drums of unknown liquids stored outside the lounge/warehouse. A partial inventory of lab pack drums (with packing lists attached) show the following materials: nitric acid, chromic acid, sulfuric acid, sodium hydroxide, trichloroacetic acid, lithium hydroxide, calcium hydroxide, metallic sodium, phosphoric acid, hydrofluoric acid, and numerous organic acids. Additionally, two small drums have been found which are labeled with "biological hazard"

labels. HazCat analysis has indicated a number of drums which contain very caustic solutions (pH>14). Not only do the drums present a threat of release and exposure in themselves, but the haphazard storage of the drums presents the threat of fire and explosion due to incompatible substances being stored next to each other. Should a fire or explosion occur, toxic fumes would likely be produced which could potentially affect the town of Hillsdale, depending upon prevailing wind direction.

#### B. Threats to the Environment

The J.P. Thomas Road site (Site A) was located on the side of a small hill on the north side of J.P. Thomas Road. The site drainage was toward the north such that site runoff drained towards a small lake/cattle pond. The pond was used to water livestock and as a "fishing hole" by local residents. The pond overflows into an unnamed intermittent creek which flows into the Tickfaw River. There are no known endangered species living near the site.

#### IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this site, if not addressed by implementing the actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

#### V. PROPOSED ACTIONS AND ESTIMATED COSTS

##### A. Proposed Actions

##### 1. Proposed Action Description

The proposed actions are as follows: evacuate and temporarily relocate the family living in the house trailer near Site A (the J.P. Thomas Road site); remove and restage all drums, the 40-foot van trailer, and the piles of ashes, soil, and debris from Site A (the J.P. Thomas Road site) to Site B (La Hwy 441 site); restage and inventory all drums at Site B (La Hwy 441 site); remove and restage all drums and debris from Site C (Amite warehouse site) to Site B (La Hwy 441 site); provide site security through both fencing and 24-hour armed security; HazCat each drum; sample and analyze selected drums in support of technical and enforcement activities; obtain sample profile and analysis for disposal options; and sample and analyze for priority pollutants soil samples from Site A (J.P. Thomas Road site), from the pond north of the Site A, and from drainage pathways to determine potential offsite migration.



These proposed actions will mitigate the direct contact threat with the materials in the drums, and will segregate the drums by compatibility class in order to reduce the fire and explosion threat posed by the haphazard staging as it presently exists. Additionally, by staging the drums inside the lounge/warehouse at Site B (La Hwy 441 site), the drums are stored inside a building and out of the weather. Before the full nature of the contents of the drums and the extent of potential contamination are known, HazCat sampling and analysis of drum contents must be completed. It is anticipated that this process will continue for at least 30 days.

## 2. Contribution to Remedial Performance

As stated, the Hillsdale Drum Site has not received any type of remedial investigation and there is no proposed long-term remedial plan for the site.

## 3. Description of Alternative Technologies

No alternative technologies were considered.

## 4. Applicable or Relevant and Appropriate Requirements (ARARs)

See Attached ARARs Listing.

## 5. Project Schedule

As stated, verbal approval to initiate a classic emergency removal action, with an initial ceiling of \$100,000 was given by the Regional Administrator on February 13, 1992. The ERCS contractor was mobilized on-site on February 14, 1992 and the removal action initiated. It is anticipated that on-site sampling and staging operations will continue for at least 30 days. A contract has been signed with a laboratory which specifies a 21-day turn around time for analysis of samples.

### B. ESTIMATED EXTRAMURAL COSTS:

Regional Allowance Cost:	Total
ERCS Costs:	\$ 605,000
Labor/Per Diem .....	\$ 150,000
Equipment/Materials.....	125,000
Site Security .....	50,000
Lodging .....	30,000
Analytical .....	250,000

Other Extramural Costs Not Funded From Regional Allowance:

	Total
TAT, including multiplier .....	\$ 150,000
Total NCLP .....	\$ 0
Total ERT/REAC .....	\$ 5,000
Subtotal Extramural Costs .....	\$ 760,000
Extramural Costs	
Contingency .....	\$ 190,000
TOTAL EXTRAMURAL COSTS .....	\$ 950,000
INTRAMURAL COSTS:	
Intramural Direct Costs .....	\$ 25,000
Intramural Indirect Costs .....	\$ 36,000
TOTAL, INTRAMURAL COSTS .....	\$ 61,000
TOTAL, REMOVAL PROJECT CEILING .....	\$1,011,000

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE  
DELAYED OR NOT TAKEN

Should the actions described in this Action Memorandum be delayed or not taken, the drums stored at the Hillsdale Drum Site would continue to pose a fire/explosion threat to the nearby residents of the Town of Hillsdale. The actions described herein are actions which are necessary to stabilize the site and stage the drums according to their compatibility class.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT ADDENDUM

See Attached ENFORCEMENT ADDENDUM

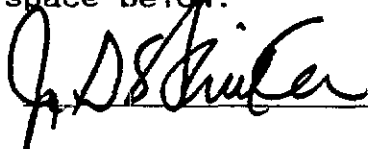
## IX. RECOMMENDATION

This decision document represents the selected classic emergency removal action for the Hillsdale Drum Site, Hillsdale, St. Helena Parish, Louisiana, developed in accordance with CERCLA, as amended by SARA, and not inconsistent with the National Contingency Plan (NCP). This decision is based on the Administrative Record for the site. Conditions at the site meet the NCP Section 300.415(b)(2) criteria for a removal and I recommend your approval of the proposed removal action.

The actions described herein are strictly site stabilization actions, intended to protect public health and safety, and do not address removal or disposal of the materials in the drums on-site. Removal and disposal of the materials will be addressed in a second Action Memorandum. I recommend that a time period be established to allow for enforcement actions with the PRPs. I further recommend that this time period be not longer than 60 days, due to the problems with longterm storage of numerous types of hazardous materials in a facility which was not designed to store such materials.

The total project ceiling, if approved, will be \$1,011,000. Of this, an estimated \$605,000 comes from the Regional Allowance. You may indicate your approval or disapproval by signing the appropriate space below.

APPROVED: \_\_\_\_\_



DATE: \_\_\_\_\_

3-2-92

DISAPPROVED: \_\_\_\_\_

DATE: \_\_\_\_\_

## ATTACHMENTS

ARARs Listing  
ENFORCEMENT ADDENDUM

**CONFIDENTIAL DOCUMENT**

**LOCATED IN A SEPARATE, CONFIDENTIAL FILE**

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